

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

**PATRICK LONGLEY,**  
**Plaintiff**

**V.**

**BUCHANAN MARINE LP,  
Defendant**

## Civil Action

**No. 04-12548-MLW**

**JOINT SCHEDULING STATEMENT REGARDING DISCOVERY ON JURISDICTION  
AND MOTION TO DISMISS**

Now comes the parties in the above captioned matter and respectfully submits this joint scheduling statement regarding discovery on jurisdiction and motion to dismiss.

**Service of Interrogatories and Request for Production of Documents Regarding Jurisdiction:**

10/3/2005

Responses to Interrogatories and Request for Production of Documents: 11/18/2005

Completion of Depositions regarding jurisdiction: 12/30/2005

Motion to Dismiss Due: 1/13/06

Opposition to Motion to Dismiss: 2/3/06

Reply to Opposition to Motion to Dismiss: 2/10/06

WHEREFORE, the parties requests that this Honorable Court adapt the above mentioned schedule regarding discovery on jurisdiction and motion to dismiss

Respectfully submitted for the  
the Plaintiff, Patrick Longley,  
by his attorney,

/s/ Carolyn M. Latti  
Carolyn M. Latti, BBO 567394  
David F. Anderson, BBO 560994  
David J. Berg, BBO 558624  
Latti & Anderson LLP  
30-31 Union Wharf  
Boston, MA 02109  
(617) 523-1000

Respectfully submitted for the  
the Defendant, Buchanan Marine, L.P.,  
by his attorney,

/s/ Kevin Roche  
Kevin Roche, Esquire  
Halloran & Sage, LLP  
One Goodwin Square  
225 Asylum St.  
Hartford, CT 06103

Dated: September 30, 2005

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2005, I electronically filed Joint Scheduling Statement regarding discovery on jurisdiction and motion to dismiss the Clerk of the Court using CM/ECF system which will send notification of such filing(s) to the following:

Kevin Roche, Esquire  
Halloran & Sage, LLP  
One Goodwin Square  
225 Asylum St.  
Hartford, CT 06103

Respectfully submitted for the  
the Plaintiff,

/s/Carolyn M. Latti

Carolyn M. Latti

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